

1. The application states that the purpose of the project is to “fill data gaps” for certain aspects of an ongoing Remedial Investigation/Feasibility Study (RI/FS) at the Portland Harbor Superfund Site. In fact, the LWG has already collected extensive tissue data. The LWG’s Portland Harbor RI/FS Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report does identify various data gaps, but additional tissue samples are not among them. Rather, the report concludes that no further tissue samples are necessary. Further, the application states that the application was prompted by a request from the EPA; however, the EPA has not commented on the report thus such a request for additional tissue samples is not justified or necessary.

2. The application discusses alternate methods of collecting tissues but does not address alternate methods of completing the RI/FS without additional tissue samples. The application should provide an assessment of other options particularly given that the LGW’s conclusion in the Portland Harbor RI/FS Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report concludes that no further tissue samples are necessary to complete the RI/FS.